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*Application to appear *pro hac vice* forthcoming

UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

EQUALITY STATE POLICY CENTER,

Plaintiff,

v.

CHUCK GRAY, in his official capacity as
Wyoming Secretary of State, et al.,

Defendants.

Case No. 25-cv-00117-SWS

**MOTION OF LEAGUE OF WOMEN
VOTERS OF WYOMING TO
PARTICIPATE AS *AMICUS CURIAE***

The League of Women Voters of Wyoming (“LWVWY”) respectfully moves under Local Rules 7.1(b)(2)(G) and 7.1(b)(1) for leave to participate as *amicus curiae* and file the attached *amicus* brief in support of Plaintiff’s Motion for Preliminary Injunction in the above-captioned case, ECF No. 15. Plaintiffs consent to this motion. Defendant Secretary Gray objects to the motion as untimely.

In support of this motion, LWVWY states the following:

1. Proposed *amicus curiae* LWVWY is a nonpartisan, grassroots, nonprofit organization dedicated to encouraging informed and active participation in government, including through civic education, get out the vote efforts, voter registration promotion, and advocacy for voters’ rights in Wyoming. Since LWVWY’s founding in 1957, it has grown to include five local League chapters including Campbell County, Casper, Cheyenne, Fremont County, Laramie, and at-large members in Carbon, Big Horn, Park, Sheridan, and Teton Counties. LWVWY seeks to build on Wyoming’s trailblazing legacy today by ensuring that all voters—including those from traditionally underrepresented or underserved communities, such as first-time voters, non-college youth, new citizens, communities of color, the elderly, and low-income Americans—have the opportunity and information they need to exercise their right to vote. To that end, LWVWY hosts candidate forums for primary and general election, supports the County Clerks Association of Wyoming to promote voter engagement, and advances efforts to increase voter registrations across the state, with a particular focus on younger voters and lower income voters.

2. LWVWY has a demonstrated interest and expertise in the protection of voting rights and the health of democracy in Wyoming, and the application of laws like HB 156 that affect Wyomingites’ rights to participate in the democratic process.

3. “Federal courts have discretion in allowing participation as *amicus curiae*.” *New Mexico Oncology & Hematology Consultants, Ltd. v. Presbyterian Healthcare Servs.*, 994 F.3d 1166, 1175-76 (10th Cir. 2021). “An amicus brief should normally be allowed . . . when the amicus has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide.” *Rock Springs Grazing Ass’n v. Salazar*, No. 11-CV-263-NDF, 2011 WL 13162054, at *1 (D. Wyo. Dec. 15, 2011) (quoting *Ryan v. Commodity Futures Trading Comm’n*, 125 F.3d 1062, 1063 (7th Cir. 1997)).

4. Like the proposed *amici curiae* in *New Mexico Oncology & Hematology Consultants Ltd.* LWVWY “ha[s] an interest in this proceeding and brief[s] matters relevant to the disposition of the case” and should likewise be permitted to participate as *amicus curiae*. 994 F.3d at 1176. HB 156’s requirement that every voter provide documentation ostensibly to prove their citizenship imposes new and significant burdens on Wyomingites’ right to vote, that must be weighed against Secretary Gray’s justification for those burdens. *See Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 209 (2008) (plurality opinion of Stevens, J.) LWVWY has relevant expertise and a unique perspective that may aid the Court’s weighing of these factors. From its extensive experience promoting voter registration across the state, LWVWY understands that the burdens imposed by HB 156 will fall disproportionately on populations including students, lower income voters, elderly voters, and disabled voters. These burdens will frustrate LWVWY’s work promoting democratic participation in Wyoming. Moreover, from its work with local election officials, LWVWY understands that Wyoming’s voter registration process is already a restrictive outlier and that HB 156 is poorly tailored to any interest the state may claim. LWVWY seeks to provide this distinct perspective, gleaned from decades of on-the-ground civic engagement work in Wyoming.

5. Granting leave will not prejudice any party here. LWVWY does not intend to submit affidavits or declarations, participate in discovery, or proffer any experts. LWVWY is submitting this brief timely, shortly after the parties have completed their briefing on the Plaintiff's Motion for Preliminary Injunction, ECF Nos. 16, 65, 73, and prior to the resolution of that motion and a pending motion to intervene. ECF No. 57. Various other *amici* have recently sought and been granted leave to participate in this matter. ECF Nos. 63, 80, 81, 82, 87, 88, 89, 93, 97. Most of these *amici* filed their briefs after the parties completed their briefing on the Motion for Preliminary Injunction. There is thus no risk that its participation will complicate or delay the ordinary course of this case.

6. Under Federal Rule of Appellate Practice 29(a)(4), proposed *amicus curiae* LWVWY certifies that it has no parent corporation and does not issue stock, and therefore that no publicly owned company owns 10% or more of the organization's stock. Counsel for LWVWY authored the brief in its entirety and no person or entity other than LWVWY and its counsel made a monetary contribution to this brief's preparation or submission.

CONCLUSION

For the foregoing reasons, proposed *amicus curiae* LWVWY respectfully requests that this court grant LWVWY leave to participate as *amicus curiae* and to file the attached *amicus* brief in support of Plaintiff's Motion for Preliminary Injunction.

RESPECTFULLY SUBMITTED this 11th day of July 2025.



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